

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America
v.
DEMETRIO MARQUES

Case No.

16-744

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 10, 2016 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

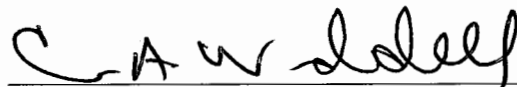
*Code Section**Offense Description*

21 USC Section 841(a)(1),(b)(1)(A)

Possession with Intent to Distribute 1 Kilogram or more of a mixture and
substance containing a detectable amount of heroin

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.


Complainant's signature

Craig A. Waddell, Special Agent, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: June 10, 2016City and state: Philadelphia, PA

Judge's signature

Jacob P. Hart, U.S. Magistrate Judge

Printed name and title

16744

AFFIDAVIT

I, Craig A. Waddell, being duly sworn, depose and say:

1. I am a Special Agent ("SA") with the United States Department of Justice, Drug Enforcement Administration ("DEA"), Philadelphia Field Division, and have been so employed since August 2001. I am empowered to conduct investigations and make arrests concerning violations of the Federal Narcotics Law as set forth in Title 21, United States Code. Prior to my employment with DEA, I was employed as a police officer with the Wilmington Police Department, Wilmington, North Carolina, for twelve years.

2. During the course of my employment in law enforcement, I have worked on not less than one thousand investigations involving violations of the Controlled Substance Act ("CSA"). I have specialized training and experience in narcotics smuggling and distribution investigations, including but not limited to, the means and methods used by traffickers to import and distribute narcotics, interdiction, smuggling methods, and the concealment and laundering of proceeds from illicit drug trafficking activities. I have participated in numerous narcotics investigations, debriefed or participated in debriefings of hundreds of defendants, informants, and witnesses who had personal knowledge regarding major narcotics trafficking organizations, and have participated in all aspects of drug investigations including conducting surveillance, analyzing information obtained from court-ordered pen register and trap and trace intercepts, and analyzing telephone toll information obtained as a result of subpoenas issued by the DEA.

3. This affidavit is being submitted in support of a Criminal Complaint and Arrest Warrant for the arrest of Demetrio MARQUEZ on charges of possess with intent to distribute a

controlled substance, namely, more than 1,000 grams of heroin, in violation of Title 21 United States Code, Section 841(b)(1)(A).

4. This affidavit is based upon my personal knowledge, experience and training, and other information developed during the course of this investigation. This affidavit is also based upon information and experience imparted to me by other law enforcement officers. Since this affidavit is being submitted for the limited purpose of obtaining an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts I believe are necessary to establish probable cause for the arrest of Demetrio MARQUEZ on the specific charge of possession with intent to distribute heroin.

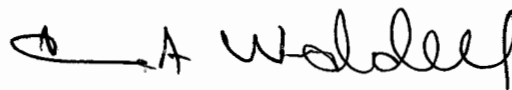
FACTS ESTABLISHING PROBABLE CAUSE

5. On June 9, 2016, at approximately 4:59 p.m., DEA Special Agent Sean Harvey conducted a vehicle stop of a Ford Transit van at 100 East Hunting Park Avenue in Philadelphia. The driver of the Ford Transit van was identified as Demetrio MARQUEZ. Another person was in the front passenger seat. Minutes later, SA Michael Dunn and TFO Eric Castellar arrived on scene. SA Dunn and TFO Castellar spoke with MARQUEZ. MARQUEZ stated to SA Dunn, "I am supposed to deliver the brown box in the back seat to someone in this area." SA Dunn inquired as to what was in the brown box. MARQUEZ stated "drugs" but stated that he did not know how much.

6. During the defendant's processing, a field test was conducted on one of the brick shaped objects for the presence of controlled substances. The test yielded a positive reaction for the presence of heroin, and had a gross weight over 1,000 grams.

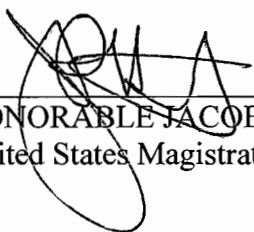
CONCLUSION

Based upon the foregoing information, your affiant submits that probable cause exists to believe that on June 9, 2016, Demetrio MARQUEZ possessed with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code 841(b)(1)(A).



Craig A. Waddell
Special Agent
Drug Enforcement Administration

Subscribed to and sworn before me this
10 day of June, 2016.


HONORABLE JACOB P. HART
United States Magistrate Judge